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Attorneys for Defendant

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

KELLY JO GOFORTH,

Plaintiff,

v.

KILOLO KIJAKAZI,
Acting Commissioner of Social Security,

Defendant.

Case No.: 2:22-cv-01792-VCF

UNOPPOSED MOTION FOR EXTENSION
OF TIME TO RESPOND TO PLAINTIFF'S
MOTION TO REMAND (FIRST REQUEST)

Defendant Andrew Saul, Commissioner of Social Security ("Defendant") respectfully requests that the Court extend the time for Defendant to file his response to Plaintiff's Motion to Remand due on May 5, 2023 by 31 days, through and including June 5, 2023.

Defendant respectfully requests this additional time because Defendant's counsel needs additional time to determine whether additional briefing is necessary. This request is made in good faith with no intention to unduly delay the proceedings.

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1 Counsel for Defendant conferred with Plaintiff's counsel, who has no opposition to this
2 motion, on May 1, 2023.

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5 Dated: May 3, 2023

6 Respectfully submitted

7 JASON M. FRIERSON
8 United States Attorney

9 /s/ Marcelo Illarmo
10 MARCELO ILLARMO
11 Special Assistant United States Attorney

12 IT IS SO ORDERED:

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14 UNITED STATES MAGISTRATE JUDGE

15 DATED: 5-3-2023
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CERTIFICATE OF SERVICE

I, Marcelo Illarmo, certify that the following individual(s) were served with a copy of the foregoing document on the date, and via the method of service, identified below:

CM/ECF:

Leonard Stone lstone@shookandstone.com

Marc V Kalagian marc.kalagian@rksslaw.com

Attorney for Plaintiff

Dated May 3, 2023

/s/ Marcelo Illarmo
MARCELO ILLARMO
Special Assistant United States Attorney